

EXHIBIT 48

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARK I. SOKOLOW, et al.,

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PLAINTIFFS,

6

-against-

Case No:
04CV397 (GBD) (RLE)

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THE PALESTINE LIBERATION ORGANIZATION, et
al.,

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DEFENDANTS.

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DATE: July 12, 2012

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TIME: 3:32 P.M.

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DEPOSITION of RICHARD BLUTSTEIN

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M.D., taken by the Defendants, pursuant to

18

Notice and to the Federal Rules of Civil

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Procedure, held at the offices of Morrison

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& Foerster, 1290 Avenue of the Americas,

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New York, New York 10104, before Robert X.

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Shaw, CSR, a Notary Public of the State of

23

New York.

24

25

1 Richard Blutstein

2 were not present at the scene of his death;
3 right?

4 A. Correct.

5 Q. Okay. Have you ever seen his
6 body?

7 A. No.

8 Q. Do you know if anyone in your
9 family has?

10 A. Um, no one in my family has
11 seen it.

12 Q. Do you know if anyone has seen
13 it?

14 A. The only -- I'm only aware of
15 one person, and that was Channan Morrison.

16 Q. And how did Mr. Morrison come
17 to view your son's body?

18 A. Well, um, that morning, at 6:30
19 in the morning, I was watching CNN and saw
20 the bombing of the Hebrew University. I
21 called Ben's cell, and it went to the
22 voice-mail.

23 A little later on in the
24 morning, there were two friends of mine
25 who had lived in Harrisburg and then moved

1 Richard Blutstein

2 objection to this question.

3 Q. Do you have any information
4 about the PA having something to do with
5 the death of your son?

6 A. Not further than whatever is
7 stated.

8 Q. Okay. So, what Mr. Leitner
9 said to you did not reflect anything that
10 you had previously told him; correct?

11 A. Correct.

12 Q. This is information Mr. Leitner
13 provided to you the first time?

14 MR. SOLOMON: Well --

15 A. Well, I'm not sure what the
16 first time is.

17 Q. Well, let me try a different
18 question.

19 When Mr. Leitner told you this,
20 this is something you didn't know before?

21 A. Yes. That is correct.

22 Q. What did Mr. Leitner tell you
23 was the evidence that the PA had something
24 to do with the death of your son?

25 MR. SOLOMON: Well, hang on a

1 Richard Blutstein

2 second. I just want to ponder the
3 question for a moment off the record.

4 Would you read it back.

5 (Whereupon, the referred to
6 question was read back by the
7 Reporter.)

8 MR. SOLOMON: Off the record.

9 (Whereupon, an off-the-record
10 discussion was held.)

11 Q. What is the evidence that the
12 PA had something to do with the death of
13 your son?

14 MR. SOLOMON: I will allow you
15 to answer that question.

16 A. Okay. My understanding is that
17 the source was Israeli intelligence.

18 Q. Okay. So, what did the source
19 of Israeli intelligence say about the PA
20 having to do, something to do with the
21 death of your son?

22 A. That -- well, it's been
23 published. I mean, it's right here in the
24 documents we've been discussing.

25 One of these, actually --

1 Richard Blutstein

2 MR. SOLOMON: This one?

3 A. -- does a pretty good job of --

4 THE WITNESS: Exhibit 44.

5 A. "In my suit against the
6 Palestinian Authority, we are presenting
7 evidence that high-ranking officials in
8 Arafat's Fatah party located in Ramallah,
9 just miles from Arafat himself, provided
10 direct and immediate logistical support to
11 the Hamas operatives in the days before
12 they murdered my son, Ben, in Jerusalem."

13 Q. And your testimony is that that
14 statement you just read is based on Israeli
15 intelligence?

16 A. It's based on what Avi Leitner
17 told me he got from Israeli intelligence.

18 Q. When Mr. Leitner told you that
19 he got this information from Israeli
20 intelligence, did he tell you who at
21 Israeli intelligence had told him this?

22 A. No.

23 Q. Did he tell you that he had a
24 document from Israeli intelligence saying
25 this?

1 Richard Blutstein

2 MR. SOLOMON: Objection.

3 A. No.

4 Q. Do you know who at Israeli
5 intelligence allegedly knows what you just
6 read?

7 A. I do not.

8 Q. Are you aware of any evidence
9 that the PA had anything to do with the
10 death of your son, other than this
11 information that allegedly came from
12 Israeli intelligence that you've described?

13 A. No.

14 Q. Are you aware of any evidence
15 that the PLO had anything to do with the
16 death of your son?

17 A. No.

18 MR. HILL: This is the next
19 exhibit.

20 (Whereupon, the aforementioned
21 document, Bates Nos. 746 to 747 was
22 marked as Defendants' Exhibit 47 for
23 identification as of this date by the
24 Reporter.)

25 Q. Let me show you what we've